

**IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT
OF VIRGINIA CHARLOTTESVILLE
DIVISION**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. (ALEX) JONES, et al.,

Defendants.

No. 3:18-cv-00017-NKM-JCH

**DEFENDANT JAMES HOFT'S CONSENT MOTION PURSUANT TO RULES 1 AND 6,
FOR EXTENSION OF TIME TO RESPOND TO MOTIONS TO QUASH,
FILED BY VIRGINIA STATE POLICE AND VIRGINIA FUSION CENTER**

On May 7, 2021, Movants Virginia State Police and Virginia Fusion Center filed a Motion to Quash the subpoena served upon them by Defendant Jim Hoft. Dkt. #287. Mr. Hoft sought consent from third party movants, in filing for the instant Motion, which seeks an extension to file Hoft's Response, through and including to Monday, May 24, 2021. *Third Party Movants Virginia State Police and Virginia Fusion Center gave their consent to this Motion.*

Mr. Hoft respectfully moves the Court for leave, pursuant to Fed. R. Civ. P. 1 and 6, for an enlargement of time to respond to both Motions, and requests a new deadline, for both Responses, on or before **May 24, 2021**. Mr. Hoft does not make this request for any improper purpose and does not believe any party will be prejudiced by granting this extension.

Dated: May 21, 2021

Respectfully submitted,

By: /s/ John C. Burns
John C. Burns, admitted *pro hac vice*
BURNS LAW FIRM
P.O. Box 191250
Saint Louis, MO 63119
Tel: (314) 329-5040
Fax: (314) 282-8136
TBLF@PM.ME

Timothy B. Hyland
Virginia Bar No. 31163
HYLAND LAW PLLC
1818 Library Street, Ste. 500
Reston, VA 20190
(703) 956-3548 (Tel.)
(703) 935-0349 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of May, 2021, a true and accurate copy of the foregoing was served on all parties of record via electronic mail.

/s/ John C. Burns